Table of Contents

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan ......................................................... 1-1

2.0 Introduction & Description of Services .................................................................................................................. 2-1
  2.1 First Time Applicant Requirements .................................................................................................................. 2-3
  2.2 Annual Certifications and Assurances ............................................................................................................. 2-4
  2.3 Title VI Plan Concurrence and Adoption ........................................................................................................... 2-4

3.0 Title VI Notice to the Public ................................................................................................................................... 3-1
  3.1 Notice to Public .................................................................................................................................................. 3-1
  3.2 Notice Posting Locations .................................................................................................................................. 3-1

4.0 Title VI Procedures and Compliance ..................................................................................................................... 4-2
  4.1 Complaint Procedure ........................................................................................................................................ 4-2
  4.2 Complaint Form ............................................................................................................................................... 4-3
  4.3 Record Retention and Reporting Policy ........................................................................................................... 4-3
  4.4 Sub-recipient Assistance and Monitoring ........................................................................................................ 4-3
  4.5 Contractors and Subcontractors ....................................................................................................................... 4-3

5.0 Title VI Investigations, Complaints, and Lawsuits .............................................................................................. 5-6

6.0 Public Participation Plan ....................................................................................................................................... 6-8

7.0 Language Assistance Plan .................................................................................................................................... 7-10

8.0 Transit Planning and Advisory Bodies ............................................................................................................... 8-11

9.0 Title VI Equity Analysis ........................................................................................................................................ 9-12

10.0 System-Wide Service Standards and Service Policies ....................................................................................... 10-13
  10.1 Service Standards ........................................................................................................................................ 10-13
  10.2 Service Policies ........................................................................................................................................... 10-14

11.0 Appendices ......................................................................................................................................................... 12-1

APPENDIX A FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B CURRENT SYSTEM DESCRIPTION
APPENDIX C TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E TITLE VI COMPLAINT FORM
APPENDIX F PUBLIC PARTICIPATION PLAN
APPENDIX G LANGUAGE ASSISTANCE PLAN
APPENDIX H OPERATING AREA LANGUAGE DATA: ATHENS TRANSIT SERVICE AREA

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
<table>
<thead>
<tr>
<th>APPENDIX</th>
<th>CONTENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>DEMOGRAPHIC MAPS</td>
</tr>
<tr>
<td>J</td>
<td>TITLE VI EQUITY ANALYSIS</td>
</tr>
<tr>
<td>K</td>
<td>TEXT FORMATTING PALETTE</td>
</tr>
</tbody>
</table>
1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Athens Transit, the Transit department of the Unified Government of Athens-Clarke County assures the Georgia Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Athens Transit further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient’s Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient’s organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against Athens Transit.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency’s programs.
8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature: 

Printed Name: Butch McDuffie
Transit Director, Unified Government of Athens-Clarke County Date: Dec 14, 2018

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
2.0 Introduction & Description of Services

Athens Transit is the Transit department of the Unified Government (UG), and the general public transportation provider for the county. The Unified Government of Athens-Clarke County (ACCUG) is a unified city/county government located in the northeast section of the state of Georgia and is approximately sixty (60) miles northeast of Atlanta, Georgia. The Unified Government of Athens-Clarke County (the government’s official name) was formed in 1991 by a referendum which required the combining of The City of Athens and Clarke County. ACCUG serves an area population of approximately 120,000 with annual growth projected at 1% per year. ACCUG provides a multitude of local and state funded services, which includes, but is not limited to, Public Safety, Utility, Courts, Corrections, Tax and Transit Services. ACCUG employs approximately 1,500 people.

Athens Transit / Athens-Clarke County is a sub-recipient of FTA funds and provides service in Athens-Clarke County. A description of the current Athens Transit system is included in Appendix B.

Athens Transit submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Title VI Liaison
Stephanie Maddox, Internal Auditor
Unified Government of Athens-Clarke County Operational Analysis
706-613-3012
Stephanie.maddox@accgov.com
301 College Avenue, Suite 202, Athens, Georgia 30601

Alternate Title VI Contact
Jill Arquette, Management Analyst
Unified Government of Athens-Clarke County Operational Analysis
706-613-3012
Jill.Arquette@accgov.com
301 College Avenue, Suite 202, Athens, Georgia 30601

Athens Transit / Athens-Clarke County must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.
2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

Athens Transit / Athens-Clarke County in not a first time applicant for FTA/GDOT funding. The following is a summary of Athens Transit current and pending federal and state funding.

Current and Pending FTA Funding

1. Section 5339 Transit Capital Grant, FY 2017, $2,563,518 federal share, $320,440 state share Current

2. Section 5307 Transit Capital Grant, FY 2017, $1,872,000 federal share, $234,000 state share Current

3. Section 5307 Transit Operating Grant, FY 2017, $1,808,720 federal share, $226,090 state share Current

4. Section 5307 Transit Capital Grant, FY 2017, $3,610,400 federal share, $451,300 state share Pending

5. Section 5339 Transit Capital Grant, FY 2017, $1,140,000 federal share, Pending

Current and Pending GDOT Funding

6. Section 5307 Transit Capital Grant, FY 2017, $234,000 state share, Current

7. Section 5307 Transit Operating Grant, FY 2017, $226,090 state share, Current

8. Section 5307 Transit Capital Grant, FY 2017, $451,300 state share, Pending

Current and Pending Federal Funding (non-FTA)

None

Current and Pending State Funding (non-GDOT)

None

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
During the previous three years, FTA and GDOT did not complete a Title VI compliance review of Athens Transit System. Athens Transit has not been found to be in noncompliance with any civil rights requirements.

2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Athens Transit / Athens-Clarke County will remain in compliance with this requirement by annual submission of certifications and assurances as required by FTA and GDOT.

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on __________. The Plan was approved and adopted by the Athens-Clarke County Commission during a meeting held on March 1, 2015. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

Plan was updated in December, 2018.
3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee’s nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

A sample of the notice is included in Appendix D of this Plan. The sample notice should be translated into other languages, as necessary.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Athens Transit / Athens-Clarke County Unified Governments obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Athens Transit office(s) including the reception desk and meeting rooms, and on the Athens Transit website at [www.athensclarkecounty.com/transit](http://www.athensclarkecounty.com/transit) and [www.athenstransit.com](http://www.athenstransit.com). Additionally, Athens Transit will post the notice at Multimodal Transportation Center, the Athens Transit Operations and Maintenance Facility and on all transit revenue vehicles.

A sample version of this notice is included in Appendix D of this Plan in English and Spanish.
4.0 Title VI Procedures and Compliance

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Athens Transit may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form (refer to Appendix E). The Unified Government of Athens-Clarke County investigates complaints received no more than 180 days after the alleged incident. The Unified Government of Athens-Clarke County will process complaints that are complete.

Once the complaint is received, The Unified Government of Athens-Clarke County will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office within 10 calendar days of receipt.

The Unified Government of Athens-Clarke County has sixty (60) days to investigate the complaint. If more information is needed to resolve the case, the Unified Government of Athens-Clarke County may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, the Unified Government of Athens-Clarke County can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has thirty (30) calendar days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public at www.athensclarkecounty.com/transit and www.athenstransit.com.

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on at www.athensclarkecounty.com/transit and www.athenstransit.com.

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Athens Transit will submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

4.4 Sub-recipient Assistance and Monitoring

Athens Transit does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, Athens Transit utilizes the sub-recipient assistance and monitoring provided by GDOT, as needed. In the future, if Athens Transit has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

4.5 Sub recipients and Subcontractors

Athens Transit is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Athens Transit, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations. Currently, Athens Transit does not uses Third Party Operators (TPOs).

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “Contractor”) must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time,
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor’s obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.

4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Georgia Department of Transportation and/or the Federal Transit Administration, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the Georgia Department of Transportation, and/or the Federal Transit Administration, as appropriate, and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, Athens Transit shall impose contract sanctions as appropriate, including, but not limited to:
   a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
   b. cancellation, termination or suspension of the contract, in whole or in part.

6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Athens Transit, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

**Disadvantaged Business Enterprise (DBE) Policy**

As a condition of your agreement with GDOT, Athens Transit and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
opportunity to participate in the performance of contracts. Athens Transit and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of GDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

**E-Verify**

As a condition of your agreement with GDOT, vendors and contractors of Athens Transit shall utilize the U.S. Department of Homeland Security’s E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with Athens Transit. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Athens Transit shall likewise utilize the U.S. Department of Homeland Security’s E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for Athens Transit.
5.0 Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Athens Transit / Unified Government of Athens-Clarke County must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Athens Transit / Unified Government of Athens-Clarke County in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to GDOT.

Athens Transit has had two (2) investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.
### Table 1: Summary of Investigations, Lawsuits, and Complaints

<table>
<thead>
<tr>
<th>Type</th>
<th>Date (Month, Day, Year)</th>
<th>Summary (include basis of complaint: race, color, or national origin)</th>
<th>Status</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
<td>None</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lawsuits</td>
<td>None</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Complaints</td>
<td>None</td>
<td>None</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient’s targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for Athens Transit was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Athens Transit. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Athens Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts
Athens Transit is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Athens Transit’s recent, current, and planned outreach activities.

- posting transit information on the Athens-Clarke County and Athens Transit System websites
- posting information on the Athens-Clarke County webpage and Athens-Clarke County website calendars in regard to route changes, detours and service revisions

Athens Transit
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- posting information on Athens Transit revenue vehicles
- announcements in Athens-Clarke County newspapers
- announcements in Spanish language publications available in the MACORTS region (if available)
- all public hearings are publicized approximately 2 weeks before the meeting dates
- TV, Radio and printed media advertising are used on a regular basis
- TV, Radio and printed media advertising are used
- “How to Ride the Bus” public outreach programs are held monthly at the Athens-Clarke County Municipal Court, and various churches, human services agencies and various businesses
- Multiple marketing and promotional events are helps annually

**Public Hearing Requirements** See attached Major Service change policy

Athens Transit shall solicit and consider public comments prior to implementing a transit fare increase, and/or any major service reduction in transit service in the manner provided herein.

The following service changes require a public hearing process followed by review and action by the Athens-Clarke County Unified Government Mayor and Commission:

**Major Service Reduction**

A major service reduction to Athens Transit’s transit operations is defined as:

- Establishment of a new bus route and the initial schedule and headway parameters for that route
- Significant deviations in the geographical path traversed by any routes, which may impact 25% of the existing average daily ridership or could be considered out the corridor of direct service
- A substantial geographic alteration (one mile radius or more) in the termini of any route
- Elimination of a bus service not under the demonstration project status
- Modification to or increase in fare charged to the public for transit services

Public Input Periods for Route and Service Changes and Fare increase were held in 2012, 2013, and 2014 Calendar Years. No Route, Service Changes, or Fare increases have occurred since then.

- May 2012; Route / Service Changes and proposed Fare increase
- May 2013; Route / Service Changes and proposed Fare increase
- May 2014; Route / Service Changes and proposed Fare increase

Notification of service changes as well as a transcript of the public hearing held will be provided to the Georgia Department of Transportation Office of Intermodal summarizing the issues and responses received in the public hearing process with any transit fare increase, and/or any major service reduce in transit services.

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Athens Transit operates the transit system within Athens-Clarke County. The Language Assistance Plan (LAP) has been prepared to address Athens Transit’s responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Athens Transit’s service area there are 5,213 residents or 2.5% who describe themselves as not able to communicate in English very well (Source: US Census). Athens Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Athens Transit has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.
8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Athens Transit does not have a transit-related committee or board, therefore this requirement does not apply.
9.0 Title VI Equity Analysis

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Athens Transit has not constructed any facilities of this type since 1977. However, if necessary and in order to comply with the regulations, Athens Transit will ensure the following:

1. Athens Transit will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Athens Transit will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

2. When evaluating locations of facilities, Athens Transit will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.

3. If Athens Transit determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Athens Transit may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Athens Transit must demonstrate and document how both tests are met. Athens Transit will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Athens Transit has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Your Athens Transit does not have any Title VI Equity Analysis reports to submit.
Title VI Plan

Athens Transit

Transit Department of the Unified Government of Athens-Clarke County

10-13

with this Plan. Athens Transit will utilize the demographic maps included in Appendix I for future Title VI analysis.

The Title VI Equity Analysis report[s] prepared during the planning stage [is] or [are] included in Appendix J of this Title VI Plan.

10.0  System-Wide Service Standards and Service Policies

Athens Transit is a fixed route service provider.

Athens Transit has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

10.1  Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. Athens Transit has prepared standards for all modes it operates including Fixed Route and Demand Response public transit services.

a.  Vehicle Load

<table>
<thead>
<tr>
<th>Vehicle Type</th>
<th>Average Passenger Capacities</th>
<th>Maximum Load Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Seated</td>
<td>Standing</td>
</tr>
<tr>
<td>15-20' Paratransit Van</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>30' Low Floor Bus</td>
<td>28</td>
<td>10</td>
</tr>
<tr>
<td>35' Low Floor Bus</td>
<td>34</td>
<td>12</td>
</tr>
<tr>
<td>40' Low Floor Bus</td>
<td>39</td>
<td>14</td>
</tr>
</tbody>
</table>

b.  Vehicle Headway

Athens Transit

Transit Department of the Unified Government of Athens-Clarke County
### POLICY HEADWAYS AND PERIODS OF OPERATION

<table>
<thead>
<tr>
<th>WEEKDAY</th>
<th>Peak</th>
<th>Base</th>
<th>Evening</th>
<th>Night</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban Radial</td>
<td>30, 60</td>
<td>30, 60</td>
<td>60</td>
<td>NA</td>
</tr>
<tr>
<td>Peak Express</td>
<td>15</td>
<td>15</td>
<td>--</td>
<td></td>
</tr>
</tbody>
</table>

* Peak: 7-9 am and 4-6 pm; Base 6am – 6:30pm; Evening: 6:30-9:30 pm; 
"--" means no service is provided during that time period.

<table>
<thead>
<tr>
<th>SATURDAY</th>
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<tbody>
<tr>
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<tr>
<td>Peak Express</td>
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</table>

* Peak: 7-9 am and 4-6 pm; Base 6am – 6:30pm; Evening: 6:30-9:30 pm; 
"--" means no service is provided during that time period.

<table>
<thead>
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<tbody>
<tr>
<td>Urban Radial</td>
<td>60</td>
<td>60</td>
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</tr>
</tbody>
</table>

c. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than three (3) minutes late. Athens Transit’s on-time performance objective is 90% or greater. Athens Transit continuously monitors on-time performance and system results are maintained as part of monthly performance reports covering all aspects of operations.

d. Service Availability

Athens Transit will distribute transit service so that 85% of all residents in the service area are within a ¼ mile or 10 minute walk of bus service.

### 10.2 Service Policies

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Athens Transit has prepared the following policies for its transit system. Service policies establish service guidelines and performance standards to be met as resources allow, and detail the process to be used in evaluating existing and proposed service. Transit service guidelines are a set of general rules to be followed when existing transit service is modified or new service established. Performance standards serve as the criteria for evaluating both existing and proposed transit services.

Transit service policies should always be viewed in an appropriate context. For example, they should not be seen as rigid and inflexible, nor should they be substituted for good judgment. No matter how well each service policy is drawn, it cannot be universally applied.

**System Policy 1**
The public transit system should be designed, operated, and maintained within the limitations of funding and other resources available to:

1) provide a reasonable alternative to the private automobile for those who have a choice
2) provide a reasonable level of mobility for those who do not have a choice, the transit dependent.
3) provide a reasonable access to as many citizens as possible

**System Policy 2**
All features of the system shall be oriented toward attracting and serving current and potential patrons.

**System Policy 3**
Service should be designed to minimize door-to-door travel time for current and potential patrons.

**System Policy 4**
Operating practices and vehicle maintenance shall be such as to promote a safe transportation mode and minimize the possibility of any kind of accident, service delay or passenger inconvenience.

**System Policy 5**
The transit system and routes should be designed to adequately serve existing patterns of land-use and reinforce desired patterns of growth as expressed in the land-use goals of local and regional master plans.

**System Policy 6**
Proposals for improved transit services should be evaluated as broadly as possible, considering both tangible and intangible factors and the effects of such improvements on nonusers and transit system users.

**System Policy 7**
Vehicle Types
Decisions regarding vehicle size and type will be determined by:
1. The type of service to be provided (i.e. fixed route, paratransit, fixed-route deviation, demand response, express, etc.)

2. Comfort and convenience of all transit customers.

3. Compatibility with the neighborhood design and current community priorities and goals.

Identifying the appropriate size vehicle is very important both to customers and to the community at large. A bus which is undersized forces passengers to stand, decreasing riding comfort. Buses which are too large appear wasteful to the non-riding public.

4. Vehicle Replacement Schedules
Buses will be assigned to bus routes so that the average age of the buses serving any major geographic area of the community will not vary from the system average by more than 25 percent.

5. Vehicle Life cycle
Vehicle Life cycle costs for all transit vehicles should be optimized. FTA defines the minimum normal service life for buses as follows (9030.1C):

Standard Size Heavy-Duty (35'-40') - At least 12 years or 500,000 miles

Medium Size Heavy-Duty (30') - At least 10 years or 350,000 miles

Small Medium Duty (under 30') - At least 7 years or 200,000 miles

Other Vehicles - At least 5 years or 100,000 miles

System Policy 8

Provision of Service

1. Major Activity Centers
Service shall be provided and operated, wherever possible, in a manner assisting achievement of adopted local, state, and federal policies and goals, particularly in the areas of EEO, Title-VI, environmental protection (e.g., air quality, noise pollution); energy conservation and contingency plans; land-use goals; and other provisions of local and regional master plans.

All major activity centers within the urbanized area will be served, including major employment concentrations, central business district, schools, hospitals, shopping centers, commercial areas, social service and civic center locations, elderly/disabled residence concentrations, public housing, and special-use facilities (e.g. sports complexes, intercity transportation facilities, main libraries).

2. Density Standards
Service will be considered to all traffic analysis zones (TAZs) that are contiguous with the existing service area and have an average density of at least five dwelling units per acre. Provision of new service is contingent upon the cost-effectiveness of providing the service.

For areas that do not meet the requirement of five dwelling units per acre, Athens Transit shall study the feasibility of demand-responsive service instead of fixed-route service. Demand-responsive service should be effectively interfaced with fixed-route service.

3. Accessibility to Service
A. Route Spacing
Subject to terrain, street layout, pedestrian facilities, and elderly and disabled populations, bus routes will be located every 1/2 mile in urban areas (more than 3,500 persons per square mile) and every mile in suburban and rural areas (less than 3,500 persons per square mile).

Service may be closer where terrain, land-use, or street patterns inhibit walking.

B. Wheelchair Lift-Equipped Buses
All vehicles shall be wheelchair lift equipped. The fleet is 100 percent accessible, buses with wheelchair lifts and ramps are provided on all fixed routes at least once per hour during all hours of service. Wheelchair lifts and ramps in service shall be in good working order at all times.

C. Park-and-Ride Lots
Park-n-Ride lots will be developed near the edge of the transit service area. This is to provide access to transit services from areas of lower density or unsuitable street layout and to potentially reduce arterial congestion.

D. Hours of Service
Customer friendly transit service should generally be provided between 5:30 a.m. and 10:00 p.m., Monday through Friday, and Saturday and Sunday from 7:30 am until 10:00pm.

E. Service Design-Directness of Travel, Minimize out-of-direction or off-line routings.
1. Routes should not be more than 30 percent longer in distance or 40 percent longer in time than comparative trips by private automobile.

2. Route deviations should not exceed five minutes per one-way round-trip. Such deviations should achieve an average of at least five passengers per round-trip.

3. Where feasible, routes should use the same street for both directions of travel.
F. Transfers

1. Route schedules will be developed to minimize wait time. Where possible, transfer centers will be constructed to coordinate transfers between routes. Riders required to transfer should not experience average wait times greater than 15 minutes.

2. One Way Loops
   Locate only at route end points and if required by street layout.

3. Service Duplication
   Where two or more routes use the same or parallel streets, schedules should be staggered to maximize service.

4. Route Interlining
   Routes with a common terminal and a 30 percent transfer rate may be considered for interlining if:
   a. Opposite travel corridors are serviced from the terminal point
   b. Frequencies and operating hours are near identical
   c. Routes are stable and well established
   d. Combined running time does not exceed one hour and ten minutes.
   e. Route End Points should be at major activity centers to improve boarding, layover, and recovery opportunities.
   f. Short Turnarounds should be considered during off-peak travel times to improve route performance and productivity.
   g. Clock Headways are to improve passenger reliability, routes will be designed around clock headways (60, 30, 20, or 15 minute frequencies) when possible.

System Policy 9

Frequency/Capacity of Service

1. Load Factors: The maximum passenger load should never exceed the safe or legal limit. Typically, load factors will not consistently exceed:

A. 125 percent for peak-hour, peak-direction travel on radial and collector routes

B. 100 percent on express routes

C. 100 percent during midday

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
D. 125 percent on individual trips

2. Policy Headways/Headway Adjustments

Established to ensure a minimum level of service, policy headways are 60 minutes. Service intervals should not exceed this time.

The adjustment of headways is one method of bringing routes into compliance with service policies and standards. Marginal and substandard routes should be considered for lengthened headways. Routes that exceed standards should be considered for more frequent service.

45-Minute Headways - should be considered for routes or route segments, by time of day, that achieve a passenger per revenue vehicle hour (P/PVH) equal to 80 percent of the Athens Transit system average, during Peak-service hours only.

30-Minute Headways - should be considered for routes or route segments, by time of day, that achieve P/RVH equal to 100 percent of the Athens Transit system average.

15 and 20 Minute Headways – should be considered for routes or route segments, by time of day, that achieve P/RVH equal to 125-150 percent of the Athens Transit system average.

System Policy 10 Distribution of Transit Amenities

The Athens Transit bus stop improvement program’s criteria places bus stop amenities between 700 and 1200 feet apart depending on route population density, route specific points of origin and route specific destinations. The levels of improvements are based on average number of boardings a day. There are currently approximately 500 + bus stops, about 400 have completed improvements, with about 100 shelters and 200 benches. More are being planned for years 2015 -2020)

Level I ------ 1-9 boardings-------- Concrete pad, trash can, bus stop post/sign
Level II------10-20 boardings---------Concrete pad, two seat bench, trash can, bus stop post/sign
Level III --- 21 + boardings--------Concrete pad, three seat bench, bus shelter, trash can, bus stop post/sign
Level IV ---21 + boardings or Special cases, Art shelters, site specific improvements, etc.
Level V -- 21 + boardings-------- Bus bay, with Level III improvements

Other criteria;

A. Safety
1. Poles and signs will be located far enough from the edge of the roadway, in conformance with local jurisdiction standards, to avoid collisions with the bus or other vehicles.

2. Poles and signs will be located to meet the guidelines of the Americans with Disabilities Act (ADA).

3. Bus stops generally will be located at the far side of intersections, to minimize disruptions to the flow of traffic.

B. Location
In residential areas, bus stops will be placed in the following order of priority:

Adjacent to multi-family residential structures, parks, or churches
Adjacent to side yards
On or as near as possible property line
Adjacent to stop signs wherever possible.

Before placement in a front yard location, adjacent property owners will be notified. Staff will attempt to find a property owner willing to accept the bus stop, although this may not be possible in every occurrence.

C. In commercial and industrial areas, bus stops will be placed with the following considerations:

1) Minimize the reduction of on street parking
2) Avoid blocking driveways
3) Placement should be as near as possible to pedestrian access points
4) Minimize conflicts between truck and bus movements.

D. ADA Accessible Bus Stops

All new bus stops shall meet the requirements of the Americans with Disabilities Act (ADA). Efforts shall be made to bring existing bus stops up to ADA standards during roadway maintenance projects and as part of the development review process.

E. Bus Stops Signs
All bus stops shall have a sign. Each sign should have the Athens Transit logo and colors. Signs should show all routes serving that stop.

F. Passenger Shelters

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
An attempt will be made to provide shelters at stops with 20 or more boardings per day and placed according the Athens Transit Bus Stop Improvement Program. Special consideration will be made for stops used by a high percentage of senior citizens or persons with disabilities. If 50 percent or more of the users of a stop are elderly or disabled, the minimum requirement for shelter placement will drop to 10 boardings per day.

G. Passenger Benches

Passenger benches will be provided at all bus stops that have 10 or more boardings per day. Additional consideration will be made for special requests and the following types of stops.

1. Stops used by a high percentage of elderly or disabled patrons
2. Stops serving public facilities, i.e., hospitals, libraries, and schools.

System Policy 11 Effectiveness of Service

Any proposed fare increase or service changes shall consider the following factors during the planning process.

a. Assess the effects of the proposed fare or service changes.

b. Assess the alternatives available for people affected by change.

c. Determine if proposals would have a disproportionately high and adverse effect on minority and low-income riders.

d. Describe the actions proposed to minimize, mitigate, or offset any adverse effects

e. Farebox Recovery Ratio

The transit system will be evaluated annually based on its farebox recovery ratio (i.e., the ratio of revenues collected to the cost of operating the system). Steps will be taken to implement a fare policy that, when balanced against system operating costs and reduced fare programs, will achieve over time a system standard farebox ratio of 35 percent. Deviations from this policy will be considered on an annual basis based on management’s guidance.

f. System Cost per Revenue Vehicle Hour (C/RVH)

Shall increase no faster than the rate of inflation.

g. System Average Productivity

Shall exceed 25 passengers per revenue vehicle hour and 2.0 passengers per revenue vehicle mile for fixed route, and 1.5 passengers per hour for ADA complementary paratransit service.

h. Route Effectiveness

All transit routes will be evaluated annually using the following performance indicators:
Title VI Plan

Total Passengers/Revenue Vehicle Mile (P/RVM) - Measures the effectiveness of route design and scheduling in meeting ridership demand. Individual routes shall exceed 1.0 P/RVM.

Total Passengers/Revenue Vehicle Hour (P/RVH) - Measures the effectiveness of route design and scheduling in meeting ridership demand. Individual routes shall exceed 15 P/RVH. Any route falling under the minimum standard after one year of service initiation shall be evaluated for possible routing changes and/or increased marketing efforts.

Cost per Passenger (C/P) - Relates the cost of service to its utility. Individual routes cost per passenger shall exceed no more than twice the system average.

Farebox Recovery Ratio (FRR) - Relates to ratio of revenues collected to the cost of operating the system. Standard is 35 percent. Any route falling under the minimum standard after one year of service initiation shall be evaluated for possible routing changes and/or increased marketing efforts.

i. Service Changes

1. Major Service Changes
   Major service changes should not occur more than twice per year. Athens Transit staff will hold a formal public hearing for substantial changes to, or discontinuation of routes. These hearings will be advertised in locally circulated newspapers, and notices will be placed on board buses operating on the affected routes.

2. Minor Service Changes
   Will occur as needed and should only be used to correct unexpected problems. For minor changes, no public hearing is held; however, notices will be placed on board all buses as needed.

3. Service Expansion
   Service expansions will be considered as demand warrants. Strategic plan updates will be developed stating specific proposals for service improvements, marketing efforts, and planning justifications as part of Athens Transit’s annual budget process. New service will meet route standards within one year of implementation.

4. Route Effectiveness

   Projected ridership, revenue, and costs shall be estimated to determine new service feasibility studies.

5. Transit Potential

   Proposed areas for new fixed-route service should have a minimum population density of five dwelling units per acre.

6. Reduced Service

   Athens Transit
   Transit Department of the Unified Government of Athens-Clarke County
Reduced Service will be considered for routes that fall below acceptable ridership standards.

Athens Transit’s policy requires the formal public hearings to be held for any reduction in service that affects 25 percent of a route’s RVM and for advertising proposed changes a minimum of 14 days prior to implementation.
11.0 Appendices

APPENDIX A  FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B  CURRENT SYSTEM DESCRIPTION
APPENDIX C  TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D  TITLE VI SAMPLE NOTICE TO PUBLIC (ENGLISH & SPANISH)
APPENDIX E  TITLE VI COMPLAINT FORM & PROCEDURES (ENGLISH & SPANISH)
APPENDIX F  ATHENS TRANSIT PARTICIPATION PLAN
APPENDIX G  LANGUAGE ASSISTANCE PLAN- ATHENS TRANSIT / MACORTS LIMITED ENGLISH PROFICIENCY PLAN
APPENDIX H  OPERATING AREA LANGUAGE DATA: ATHENS CLARKE COUNTY AREA
APPENDIX I  DEMOGRAPHIC MAPS
APPENDIX J  TITLE VI EQUITY ANALYSIS

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers
Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

**General Requirements**

*All recipients must submit:*

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

**Requirements of Transit Providers**

*All Fixed Route Transit Providers must submit:*

- All requirements set out in Chapter III (General Requirements)
- Service standards
  - Vehicle load for each mode
  - Vehicle headway for each mode
  - On time performance for each mode
  - Service availability for each mode
- Service policies
  - Transit Amenities for each mode
  - Vehicle Assignment for each mode

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis
Appendix B

Athens Transit Description
Athens Transit Description

Athens Transit, the public transportation department of the Unified Government of Athens-Clarke County. Our department is made up of 93 full-time and part-time employees. Our Director is responsible for all of the day-to-day operations of our organization and reports directly to our County Managers. Our Mayor and County Commission are committed to this program and has, therefore, incorporated and funded our services as Athens Transit, the County’s Public Transportation Program since 1977.

Number of Employees: 93

Divisions:

   Administration
      3 FT / 1 PT-NB

   Operations
      51 FT / 25 PT-NB

   Maintenance
      12 FT / 1 PT-NB

Location(s):

Multi-Modal Transportation Center (MMTC):
775 East Broad Street, Admin: 613-3432, Information Center 613-3430

Operations and Maintenance Facility: 325 Pound Street, 613-3434

Approximately 500 bus stops throughout Athens-Clarke County including over 100 bus shelters, 200 benches and 400 trash cans

Hours of Operation:

Times for The Bus and The Lift may vary according to the route and day; however, approximate hours of operation are Monday through Saturday, 6:00 a.m. - 9:45 p.m.

Website:  www.athenstransit.com  www.athensclarkecounty/transit

Public Transit Services Delivered:

“The Bus” the fixed-route transit service provided on 19 routes with 31 accessible transit buses. The frequencies of transit services are 15, 20, 30 and 60 minutes, depending on route and time of year.

“The Lift” a ‘curb to curb’ paratransit service offered within one-mile of the fixed-
route services with 3 assessable vans. This is a demand response service that requires the passenger to schedule trips, sometimes as much as 14 days in advance.

**Operations Division** has 70 plus employees providing over 72,000 hours of public transit services annually on the two modes of transit.

**Maintenance Division** has 13 employees responsible for the daily maintenance, repair, and servicing of over 30 transit vehicles and support vehicles which operate in excess of 770,000 miles per year.

**Administration Division** has 4 employees which provide leadership, management, transit planning, and administrative support to the Operations and Maintenance divisions.

**Operating Budget**  Approximately $5,300,000 annually (FY15)

<table>
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<td>Fare Box Revenue</td>
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<td>Federal Grants</td>
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<td>ACC General Fund</td>
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Local General Funds and Federal Grants pay approximately 71% of the Annual Operating cost or 35.5% each. The annual farebox revenue pays 29% of Operating costs. The UGA transportation agreement equates to approximately 65% of annual farebox revenue, with general public riders paying 35%.

**Capital Budget**  FY 14  $1,566,387

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<td>State of Georgia</td>
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Federal Grants pay approximately 80% of Capital cost, local General Fund and State provide 10% match each.

**Annual Ridership:**

Annual Fixed-Route (The Bus) Ridership is approximately 1.8 million riders, average daily ridership 8000-8500 on 24 peak service buses, operating on 20 routes, during UGA Fall/Spring semesters, Summer average daily ridership is approximately 2500-3000 on 16 buses, operating on 16 routes. Approximately 59% of total annual fixed-route ridership is UGA affiliated, faculty, staff or student.

The average cost per passenger is approximately $2.98 per trip. General fund cost per trip is approximately $1.05, Federal share is $1.05 and Fares on average cover $0.86 per trip.
Annual Demand Response (The Lift) ridership is approximately 12,000 trips. Approximately 10% of total annual Demand Response ridership is UGA affiliated, faculty, staff or student.

**UGA/ACCUG Transportation Agreement** Athens Transit has contracted with the University of Georgia since 1977 for bus service for university students. Since FY2003, the Transportation Agreement has also included UGA faculty and staff.

This agreement includes the following discounts:

a) UGA riders qualify for the best discounted adult rate per passenger trip. The same discounted fare available to all non-UGA affiliated adult Athens Transit passengers, for FY15 the rate is $1.41 per trip.

b) Three year averaging of UGA affiliated fixed-route ridership.

c) An “intra-campus” discount of 50% off the best discounted adult bulk rate for 15% of the three year average ridership, $0.705 per trip for approximately 165,000 trips.

The FY15 Transportation Agreement is $850,463 after discounts. If discounts were not applied, the contract rate would equate to approximately $1,495,000. University pays the ACCUG $1.41 per University affiliated passenger trip. Therefore, because average cost per trip is $2.98, and the Federal share pays approximately $1.05 per trip, the ACCUG only pays $0.52 of costs for every University affiliated passenger trip or approximately $550,000 annually.

**Major Projects completed 2006-2014**

- Splost 2000 Multimodal Transportation Center (Opened Aug 2006)
- Splost 2005 / 2010 Vehicle Replacement program provided for local match funding for Federal vehicle grants, 2006-2010
- Operations and Maintenance Facility Improvements, 2009
- On-Board Automated vehicle locator/customers information system, 2009
- New Bus Wash facility construction, 2010
- MMTC and Operations/Maintenance Facility Security Systems installation, 2010
- Vehicle replacements, purchase 4 new transit coaches with 100% ARRA funds, 2011
- MMTC Solar Energy demonstrator project, 2011
- Phase III, Bus stop improvement program, 20 new bus shelters and 75 improved Level 1-2 bus stops, Summer 2011
- Federally Funded Park-n-Ride Lot at Loop 10 and Lexington Road, 2013
- 2014 Bus stop improvement program, Solar lighting added at 5 bus shelters and 29 bus stops
- Auxiliary Power Generator Operations/Maintenance Facility, Jan 2015

**Various Programs:**

- Eleven Art Bus shelters, 2009-13
- Five touch screen kiosks for passenger info, 2010-13

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
MISSION & GOALS

The mission of the Transit Department is to provide safe, courteous, cost effective efficient public transportation services to the citizens of Athens-Clarke County.

GOALS AND OBJECTIVES

- Transit is to provide transportation to employment, educational, medical, shopping, cultural, and other resource centers for community members, with special attention to those who do not have access to other modes of transportation.
  a) To identify areas with transit dependent block groups that have an above average propensity to use transit by assessing census data.
  b) Recommend change on a system wide basis to better address the needs of citizens.
  c) Emphasize regional connections for all ground transportation.
  d) Position Athens Transit as a strong alternative to automobiles by providing more frequency of service, longer hours of service, multiple transfer options, and more direct routes with shorter travel times.

- Transit provides solutions to help manage transportation corridors within Athens-Clarke County that have a deficient level of service.
  a) Assess major roadways for deficient levels of service where transit can assist in maintaining or improving level of service.
  b) Identify neighborhoods that are burdened due to cut through or commuter traffic and develop service plans.
  c) Attempt to improve air quality by reducing traffic congestion along specific corridors.

- Reduce the need for parking facilities within the CBD and UGA campus therefore allowing maximum utilization of land for more productive purposes.
  a) Locate parking areas that are remote from the CBD and UGA campus.
  b) Develop park-n-ride sites with direct service to the CBD and UGA campus.
  c) Educate employers, the business community and citizens about the economic benefits of Athens Transit.
  d) Encourage more partnerships with employers and business communities.

- ATS operates in such a manner that is cost effective.
  a) Continue to pursue dedicated funding sources for transit services. (Examples; local option sales tax, gasoline tax, etc.)
  b) Develop alternative revenue sources that have the least impact on local community tax payers.
c) Create a fare structure with a subsidized rate for people with low incomes.
d) Utilize SPLOST funding to supplement capital expenses.
e) Thoroughly investigate options using new technology to achieve operating cost savings.

- Continue to foster the ATS and UGA transit services interface in order to achieve community goals.
  a) Continue to coordinate with Campus Transit to avoid duplication of transit services.
  b) Develop specific services in conjunction with Campus Transit, tailored to meet the needs of UGA affiliated passengers.

**SERVICE GOALS**

**Fixed Route Service – “The Bus”**
- Provide safe, timely transit services to our community and a safe service environment for customers and employees.
- Ensure that safe, clean, well-maintained vehicles are available to operate all trips as scheduled.
- Achieve a high level of rider satisfaction and an on-time performance rate that exceeds 95%.
- Maximize fare revenue, while providing economical services.
- Limit the cost of providing service by generating more revenue.
- Increase community awareness and encourage use of available transit service.
- Implement innovative route and scheduling methods to reduce cost and promote increased ridership.

**Paratransit Demand Response – “The Lift”**
- Limit the increasing cost of providing service by ensuring only qualified individuals are permitted to use the service.
- Achieve a high level of rider satisfaction and an on-time performance rate that exceeds 95%.
- Optimize scheduling to effectively utilize resources.
- Implement innovative route and scheduling methods to reduce cost and promote increased ridership.
PERFORMANCE MEASURES

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<tr>
<th></th>
<th>Actual FY12</th>
<th>Actual FY13</th>
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<td>Ridership</td>
<td>1,749,757</td>
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<td>$0.92</td>
<td>$0.93</td>
<td>$0.92</td>
<td>$1.06</td>
</tr>
<tr>
<td>General Fund Cost Per Passenger</td>
<td>$1.04</td>
<td>$1.06</td>
<td>$0.96</td>
<td>$0.95</td>
<td>$1.24*</td>
</tr>
<tr>
<td>Demand Response (The Lift)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ridership</td>
<td>9,520</td>
<td>9,711</td>
<td>8,740</td>
<td>9,000</td>
<td>8,500</td>
</tr>
<tr>
<td>Passengers Per Hour</td>
<td>1.52</td>
<td>1.55</td>
<td>1.34</td>
<td>1.36</td>
<td>1.28</td>
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<tr>
<td>Revenue per Passenger</td>
<td>$2.44</td>
<td>$2.45</td>
<td>$2.72</td>
<td>$3.12</td>
<td>$3.09</td>
</tr>
<tr>
<td>General Fund Cost Per Passenger</td>
<td>$18.08</td>
<td>$18.44</td>
<td>$14.35</td>
<td>$13.71</td>
<td>*$15.75</td>
</tr>
</tbody>
</table>

* This increase is due to the reduction of UGA contract revenue and crediting of FY14 STIC funds.

OTHER INFORMATION

1. Athens-Clarke County responsible for insurance and is a self-insured government.
2. Athens Transit staff is responsible for training and management, and administration of all public transportation programs.
3. Athens Transit staff are responsible for vehicle maintenance and record keeping.
4. Number of current transportation related employees 93
5. Athens Transit staff drive the vehicles, number of drivers approximately 70, all are CDL licensed,
Appendix C
Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter
Title VI Plan

Insert a copy of the Title VI Plan adoption meeting minutes and the GDOT concurrence letter. This will be inserted once it’s available. Current plan is to submit the GDOT approved Title VI plan for Mayor and Commission approval at the March 2, 2015 voting meeting.
Appendix D

Title VI Sample Notice to Public
(English & Spanish)
Notice of Public Rights Under Title VI

ATHENS TRANSIT

Athens Transit operates its programs and services without regard to race, color, and national origin, in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Athens Transit.

For more information on Athens Transit’s civil rights program, and the procedures to file a complaint, contact 706-613-3432, email: www.athenstransit.com/contact-ats.html
or visit our administrative offices at:
775 East Broad Street, Athens, GA 30601.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights,
Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR,
1200 New Jersey Ave., SE, Washington, DC 20590
If information is needed in another language, contact 706-613-34

Aviso de derechos públicos bajo Título VI

ATENAS TRÁNSITO

Atenas Tránsito opera sus programas y servicios sin tener en cuenta raza, color y origen nacional, en acuerdo con el Título VI de la Civil Ley de Derechos. Cualquier persona que cree que es él o ella ha sido perjudicada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con Atenas Tránsito.

Para obtener más información sobre el programa de derechos civiles de Atenas Tránsito, y los procedimientos para presentar una queja, comuníquese con 706-613-3432,
email: www.athenstransit.com/contact-ats.html
o visite nuestras oficinas administrativas en:
775 East Broad Street, Athens, GA 30601.

Un demandante puede presentar una queja directamente con el Tránsito Federal Administración mediante la presentación de una queja ante la Oficina de Derechos Civiles,
Atención: Coordinador del Programa VI Título, East Building, 5th Floor-TCR,
1200 New Jersey Ave., SE, Washington, DC 20590

Si se necesita información en otro idioma, comuníquese con 706-613-3432.
Appendix E

Title VI Complaint Form & Procedures
(English & Spanish)
Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Note: The following information is necessary to assist the Unified Government of Athens-Clarke County (ACCUG) in processing your complaint. Should you require any assistance in completing this form, please contact the Title VI Coordinator. Complete and return this form to Stephanie Maddox, Title VI Coordinator, City Hall, 301 College Avenue, Athens, Georgia 30605.

1. Complainant’s Name ______________________________________________

2. Address ______________________________________________________________________________________

3. City, State and Zip Code__________________________________________________________________________

4. Telephone Number (home) ____________________(business)_________________

5. Person discriminated against (if someone other than the complainant)
   Name___________________________________________________________
   Address_________________________________________________________
   City, State and Zip Code____________________________________________

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:
   a. Race/Color____________________________________________________
   b. National Origin_______________________________________________
   c. Other________________________________________________________

7. What date did the alleged discrimination take place? _____________________

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.
   ________________________________________________________________________________________________
   ________________________________________________________________________________________________
   ________________________________________________________________________________________________
   ________________________________________________________________________________________________

The Unified Government of Athens-Clarke County, Georgia

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? ______ Yes ______ No

If yes, check all that apply:

_____ Federal agency ______ Federal court ______ State agency
_____ State court ______ Local agency

10. Please provide information about a contact person at the agency/court where the complaint was filed.

Name___________________________________________________________
Address________________________________________________________________
City, State, and Zip Code ________________________________________________
Telephone Number _____________________________________________________

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

___________________________________________    ______________
Complainant’s Signature      Date
El Gobierno Unificado del Condado de Athens-Clarke, Georgia

Formulario de Queja Título VI

Título VI de la Ley de Derechos Civiles de 1964 establece que "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, ser excluida de participar en, ser negado los beneficios de, o ser objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal ".

Notas: La siguiente información es necesaria para ayudar al Gobierno Unificado del Condado de Athens-Clarke (ACCUG) en la tramitación de su queja. Si necesita ayuda para completar este formulario, por favor póngase en contacto con el Coordinador del Título VI. Completar y devolver este formulario a Stephanie Maddox, Título VI Coordinador, City Hall, 301 College Avenue, Athens, Georgia 30605.

1. Nombre del demandante ______________________________________________________
2. Address _________________________________________________________________
3. Ciudad, Estado y Código Postal Code _______________________________________
4. Teléfono(casa) ________________ (negocio) _____________________________
5. Persona discriminado (si alguien que no sea el demandante)
   Nombre _________________________________________________________________
   Address __________________________________________________________________
   Ciudad, Estado y Código Postal ____________________________________________
6. ¿Cuál de las siguientes opciones describe mejor la razón por la que cree que se produjo la discriminación? ¿Fue por su:
   a. Raza / color _____________________________________________________________
   b. Nacional Origin _________________________________________________________
   c. otro ___________________________________________________________________
7. ¿En qué fecha la supuesta discriminación se llevan a cabo? ___________________ 
8. En sus propias palabras, describir la supuesta discriminación. Explique lo que pasó y quien considera que fue responsable. Utilice el reverso de este formulario si necesita más espacio.

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
9. ¿Ha presentado esta queja con cualquier otro federal, estatal o local; o con cualquier corte federal o estatal? ________ Sí ________ No

En caso afirmativo, marque todo lo que corresponda:

_____Agencia Federal _____ Corte Federal Agencia _____ State Corte
_____State agencia _____ Agencia Local

10. Sírvanse proporcionar información sobre una persona de contacto en la agencia / tribunal donde se presentó la denuncia.

Name ________________________________________________________________
Address .....................................................................................................
Ciudad, estado y código postal ..................................................................
Número de teléfono ....................................................................................

11. Por favor, firme abajo. Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Del demandante Firma ___________________________ Fecha _____________
Unified Government of Athens-Clarke County’s

Title VI Nondiscrimination Complaint Procedures

Overview

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973, and the Civil Rights Restoration Act of 1987 relating to any program or activity administered by ACCUG or its subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

Right to File Complaints

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints informally at the recipient and subrecipient level. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

Procedures

1. Any individual, group of individuals, or entity that believes it has been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with ACCUG’s Title VI Coordinator using the Title VI Complaint Form attached hereto and incorporated herein by reference. A formal complaint must be filed in writing or in person by the complainant and/or his/her representative no later than 180 calendar days after the alleged discrimination occurred or after the alleged discrimination became known to the complainant. The complaint must meet the following requirements:
   a. Complaint shall be in writing and signed by the complainant(s).
   b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
   c. Present a detailed description of the issues, including but not limited to names and job titles of those individuals perceived as parties in the complained-of incident.
   d. Generally, the Title VI Coordinator will acknowledge receipt of a complaint within 10 days of it being submitted and inform the complainant of action taken or any possible action to process the complaint; provided that the complainant must first provide the identity(ies) of the complainant(s) and affirm its intent to proceed with the complaint.
   e. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will
be forwarded to the complainant for him/her to complete, sign, and return to the Title VI Coordinator for processing.

Failure of the complainant to respond to requests for information may result in a dismissal of the complaint.

2. Upon receiving the written complaint, ACCUG will determine its jurisdiction, acceptability of the complaint, need for additional information, and the investigative merit of the complaint. In some situations, ACCUG may request GDOT’s Office of Equal Employment Opportunity to conduct the investigation. In the event GDOT handles the investigation, GDOT will follow its adopted procedures for investigating discrimination complaints, per its current Title VI Plan.

3. A complaint may be dismissed for the following reasons:
   a. The complainant requests the withdrawal of the complaint.
   b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
   c. The complainant cannot be located after reasonable attempts.

4. If the complaint is against a subrecipient, consultant, or contractor under contract with ACCUG, the appropriate sub-recipient, consultant, or contractor shall be notified of the complaint within fifteen (15) calendar days of the County receiving the complaint.

5. Once ACCUG decides its course of action, the complainant and the respondent will be notified in writing of such determination within five (5) calendar days. The complaint will be logged in the Title VI Coordinator's records along with the basis for the allegation identified and the race, color, national origin, handicap/disability, age and gender of the complainant.

6. In cases where ACCUG assumes the investigation of the complaint, the Title VI Coordinator will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days to furnish the Title VI Coordinator with his/her response to the allegations.

7. Within 60 calendar days of the acceptance of the complaint, the Title VI Coordinator (or GDOT investigator) will prepare an investigative report. Only qualified, well-trained investigators should conduct the investigations. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

8. The investigative report shall be reviewed by the ACCUG Attorney’s office (the “Attorney”). The Attorney may discuss the report and its recommendations with the Title VI Coordinator.
Title VI Plan

VI Coordinator and other staff as appropriate. The report will be modified as needed and made final for its release to the complainant and respondent.

9. Once the investigative report becomes final, briefings will be scheduled with the complainant and respondent within fifteen (15) calendar days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.

10. A copy of the final investigative report and a copy of the complaint will be forwarded to the Georgia Department of Transportation Office of Equal Employment Opportunity within sixty (60) calendar days of the completion of the briefings.

11. If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s), he or she shall be advised of his/her rights to appeal ACCUG’s decision to GDOT, United States Department of Transportation (USDOT), United States Department of Justice (USDOJ), or other entity as appropriate. The complainant has thirty (30) calendar days after ACCUG’s briefing to appeal. Unless new facts not previously considered come to light, reconsideration of ACCUG’s opinion will not be available.

12. A Complaints Log shall be maintained annually by ACCUG. The Complaints Log shall contain the following information for each complaint filed:
   a. The name and address of the person filing the complaint
   b. The date of the complaint
   c. The basis of the complaint
   d. The disposition of the complaint

13. ACCUG shall not be allowed to investigate a complaint against itself.
Visión de Conjunto

Estos procedimientos se aplican a todas las quejas presentadas en virtud del Título VI de la Ley de Derechos Civiles de 1964 según enmendada, Sección 504 de la Ley de Rehabilitación de 1973, y la Ley de Restauración de Derechos Civiles de 1987, relativa a cualquier programa o actividad administrada por ACCUG o sus beneficiarios secundarios, consultores, y / o contratistas. La intimidación o represalias de cualquier tipo está prohibida por la ley.

Derecho a Presentar Quejas

Estos procedimientos no niegan el derecho del demandante a presentar denuncias formales con otras agencias estatales o federales o de buscar un abogado privado para denuncias de discriminación. Se hará todo lo posible para resolver las quejas de manera informal en el receptor y el nivel de sub-receptor. La opción de la reunión de mediación informal (s) entre las partes afectadas y el Coordinador del Título VI se puede utilizar para su resolución.

Procedimientos

1. Cualquier persona, grupo de personas, o entidad que cree que ha sido víctima de una discriminación prohibida por disposiciones de no discriminación del Título VI, puede presentar una queja por escrito al Coordinador del Título VI de ACCUG utilizando el Formulario de Queja Título VI que se adjunta e incorporada aquí como referencia. Una queja formal debe ser presentada por escrito o en persona por el demandante y / o su representante / a más tardar 180 días naturales después de que ocurrió la supuesta discriminación o después de la supuesta discriminación se hizo conocido al demandante. La queja debe cumplir los siguientes requisitos:
   a. Queja deberá ser por escrito y firmado por el demandante (s).
   b. Incluya la fecha del supuesto acto de discriminación (fecha en que el denunciante (s) se dio cuenta de la supuesta discriminación, o la fecha en que se suspendió esa conducta o la última instancia de la conducta).
   c. Presentar una descripción detallada de los temas, incluyendo pero no limitado a los nombres y cargos de las personas que se perciben como partes en el quejado de incidente.
   d. En general, el Coordinador del Título VI acusará recibo de una queja dentro de los 10 días de que se presenta e informar al denunciante de las medidas adoptadas o cualquier acción posible procesar la queja; a condición de que el demandante debe primero proporcionar la identidad (es) de la querellante (s) y afirmar su intención de proceder con la denuncia.
   e. Las denuncias recibidas por teléfono se reducirán a la escritura y proporcionados a la demandante para su confirmación o revisión antes de su procesamiento. Un formulario de queja será remitida a la demandante para él / ella para completar,
2. Una vez recibida la queja por escrito, ACCUG determinará su jurisdicción, la aceptabilidad de la queja, la necesidad de información adicional, y el mérito de investigación de la queja. En algunas situaciones, puede solicitar ACCUG Oficina de Igualdad de Oportunidades en el Empleo de GDOT para llevar a cabo la investigación. En caso GDOT maneja la investigación, GDOT se seguirá sus propios procedimientos para la investigación de quejas de discriminación, por su actual plan del Título VI.

3. Las reclamaciones podrán ser desestimado por las siguientes razones:
   a. El demandante solicita la retirada de la denuncia.
   b. El denunciante no responde a las reiteradas solicitudes de información adicional necesaria para tramitar la denuncia.
   c. El denunciante no puede ser localizado después de intentos razonables.

4. Si la queja es contra un sub-beneficiario, consultor o contratista bajo contrato con ACCUG, la adecuada sub-receptor, consultor o contratista serán notificadas de la reclamación dentro de los quince (15) días calendario a partir de la Provincia que reciben la queja.

5. Una vez ACCUG decide su curso de acción, el demandante y el demandado serán notificados por escrito de dicha determinación dentro de los cinco (5) días calendario. La queja se registrará en los registros del Coordinador del Título VI, junto con la base de la denuncia identificada y la raza, color, origen nacional, discapacidad / incapacidad, edad y sexo de la demandante.

6. En los casos en ACCUG asume la investigación de la queja, el Coordinador del Título VI proporcionará al demandado la oportunidad de responder a las alegaciones por escrito. El demandado tendrá 10 días naturales para amueblar el Coordinador del Título VI con su / su respuesta a las acusaciones.

7. Dentro de los 60 días naturales siguientes a la aceptación de la queja, el Coordinador del Título VI (o GDOT investigador) preparará un informe de investigación. Sólo investigadores calificados y bien entrenados deben llevar a cabo las investigaciones. El informe incluirá una descripción narrativa de los hechos, la identificación de las personas entrevistadas, hallazgos y recomendaciones para su disposición.

8. El informe de la investigación, será examinada por la oficina del Fiscal de ACCUG (el "abogado"). El Fiscal podrá discutir el informe y sus recomendaciones con el Coordinador del Título VI y el resto del personal, según corresponda. El informe se modificará según sea necesario y hecho final para su lanzamiento a la demandante y el demandado.
9. Una vez que el informe de la investigación se convierte en definitivo, sesiones informativas se programarán con el demandante y el demandado dentro de los quince (15) días calendario. Tanto el demandante como el demandado recibirán una copia del informe de la investigación durante las sesiones informativas y será notificado de sus respectivos derechos de apelación.

10. Una copia del informe final de investigación y una copia de la queja será remitida al Departamento de Transporte Oficina de Igualdad de Oportunidades en el Empleo de Georgia dentro de los sesenta (60) días naturales siguientes a la finalización de las sesiones informativas.

11. Si el demandante o el demandado no está satisfecho con los resultados de la investigación de la práctica discriminatoria alegada (s), él o ella será informado de sus / sus derechos para apelar la decisión del ACCUG a GDOT, Departamento de Transporte de Estados Unidos (US DOT), los Estados Unidos Departamento de Justicia (USDOJ), u otra entidad, según corresponda. El demandante tiene treinta (30) días calendario después de la sesión informativa de ACCUG apelar. A menos que nuevos hechos que antes no considerados salen a la luz, la reconsideración de la opinión de ACCUG no estará disponible.

12. A Quejas Login serán mantenidos anualmente por ACCUG. Las quejas Iniciar deberán contener la siguiente información para cada denuncia presentada:
   a. El nombre y la dirección de la persona que presenta la queja
   b. La fecha de la denuncia
   c. La base de la queja
   d. La disposición de la queja

13. ACCUG no estará autorizado a investigar una denuncia contra si mismo.
Appendix F

Athens Transit Participation Plan
Introduction

The Public Participation Plan (PPP) for Athens Transit was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process. As policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Athens Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Athens Transit also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Athens Transit and its operations. The goals for this PPP include:

- **Inclusion and Diversity**: Athens Transit will proactively reach out and engage low-income, minority, and LEP populations for the service area so these groups will have an opportunity to participate.
- **Accessibility**: All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public’s participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance**: Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive**: Athens Transit will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored**: Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible**: The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Athens Transit. Athens Transit intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.
Athens Transit will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Athens Transit and Athens-Clarke County website (www.athenstransit.com and/or www.athensclarkecounty.com/transit) and all feedback on the site will be recorded and passed on to management. The public will also be able to call the Athens Transit office at 706-613-3430 during its hours of operation. Feedback collected over the phone will be recorded and passed on to management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Athens Transit will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisements
- Posters or flyers in transit center
- Posting information on websites
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

Public Hearing

When required Athens Transit will hold public hearings in accordance with FTA, GDOT and local guidelines.

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Athens Transit shall solicit and consider public comments prior to implementing a transit fare increase, and/or any major service reduction in transit service in the manner provided herein.

Athens Transit’s public hearing procedures are described in Chapter 6.

The following service changes require a public hearing process followed by review and action by the Athens-Clarke County Unified Government Mayor and Commission:

**Major Service Reduction**

A major service reduction to Athens Transit’s transit operations is defined as:

- Establishment of a new bus route and the initial schedule and headway parameters for that route
- Significant deviations in the geographical path traversed by any routes, which may impact 25% of the existing average daily ridership or could be considered out of the corridor of direct service
- A substantial geographic alteration (one mile radius or more) in the termini of any route
- Elimination of a bus service not under the demonstration project status
- Modification to or increase in fare charged to the public for transit services

Notification of service changes as well as a transcript of the public hearing held will be provided to the Georgia Department of Transportation Office of Intermodal summarizing the issues and responses received in the public hearing process with any transit fare increase, and/or any major service reduce in transit services.
Appendix G
Language Assistance Plan (LAP) MACORTS / Athens Transit Limited English Proficiency Plan
Limited English Proficiency Plan
Final February 19, 2014
Prepared by Athens-Clarke County Planning Department

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Limited English Proficiency Plan
for
Madison Athens-Clarke Oconee Regional Transportation Study
and
Athens Transit System

Final
February 19, 2014

Prepared By:
Athens-Clarke County Planning Department

The Limited English Proficiency Plan (LEP) is established pursuant to and in accordance with Title VI of the Civil Rights Act and Executive Order 13166, “Improving Access to Services for Persons With Limited English Proficiency.”

The opinions, findings, and conclusions in this publication are those of the author(s) and are not necessarily those of the Federal Transit Administration, Federal Highway Administration, or Georgia Department of Transportation.
RESOLUTION BY THE MADISON ATHENS-CLARKE OCONEE REGIONAL TRANSPORTATION STUDY (MACORTS) POLICY COMMITTEE

WHEREAS, federal regulations require that the Limited English Proficiency Plan for urbanized areas must be completed and periodically be updated and,

WHEREAS, the Technical Coordinating Committee of MACORTS in coordination with the Federal Highway Administration, Federal Transit Administration, and the Georgia Department of Transportation has reviewed the Limited English Proficiency Plan,

WHEREAS, the Technical Coordinating Committee at its January 22, 2014 meeting recommended the approval of the Limited English Proficiency Plan for MACORTS and the Athens Transit System:

NOW, THEREFORE, BE IT RESOLVED that the MACORTS Policy Committee concurs with the recommendation of the Technical Coordinating Committee of MACORTS to approve the Limited English Proficiency Plan.

CERTIFICATION

I hereby certify that the above is a true and correct copy of a Resolution adopted by the Madison Athens-Clarke Oconee Regional Transportation Study Policy Committee, at their meeting held on February 19, 2014.

Recommended by:

Brad Griffin
TCC Chairman / MPO Director

February 19, 2014

Melvin Davis
MACORTS Policy Committee Chairperson

February 19, 2014
Table of Contents

Introduction........................................................................................................................................1
Purpose...........................................................................................................................................1
Four Factors to Formulate an LEP Plan ............................................................................................1
Madison Athens-Clarke Oconee Regional Transportation Study ..................................................2
Athens Transit System ....................................................................................................................3
Limited English Proficiency Analysis ..............................................................................................4
  Factor 1: Number of LEP persons served in eligible service population ....................................4
  Factor 2: The frequency with which LEP persons encounter the services provided .................10
  Factor 3: The nature and importance of the services and programs .........................................11
  Factor 4: The resources available to MACORTS, ATS, and Overall cost .............................11
Providing Notice to LEP Persons .....................................................................................................12
Implementation of LEP Initiatives ..................................................................................................12
MACORTS and ATS Staff Training .................................................................................................12
LEP Plan Access ..............................................................................................................................13
List of Tables

1. Total Speakers by Race, Age 5 – 65+ ................................................................. 4
2. Total Speakers by Race, Age 18 – 65+ ............................................................... 5
3. Top Ten Languages Spoken in MACORTS Region ............................................. 6
4. Top Ten Languages Spoken in Athens-Clarke County ...................................... 6
5. Total Limited English Proficiency Speakers ..................................................... 7
6. Limited English Proficiency Customers of Athens-Clarke County Planning Department 10
7. Limited English Proficiency Riders of Athens Transit System ......................... 11

List of Figures

1. Madison Athens-Clarke Oconee Regional Transportation Study Planning Boundary.....2
2. Athens Transit System Map ................................................................................ 3
3. LEP Persons by Census Tracts Compared to Regional Total ................................ 8
4. LEP Persons by Census Tracts in Athens-Clarke County with ATS Service Overlay .... 9
Introduction
On August 11, 2000, President William J. Clinton signed Executive Order 13166, “Improving Access to Service for Persons with Limited English Proficiency”, to clarify Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the grounds of race, color, or national origin by any entity receiving federal financial assistance. Administrative methods or procedures that have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations are prohibited. The purpose of Executive Order 13166 is to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

Purpose
The purpose of this Limited English Proficiency (LEP) Plan is to demonstrate compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. The LEP Plan is for persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Such persons may be eligible to receive language assistance with respect to a particular service, benefit, or encounter. This Plan will examine the services and products provided by the Madison Athens-Clarke Oconee Regional Transportation Study (MACORTS) and the Athens Transit System (ATS). The Plan will outline current accommodations made for LEP persons and possible future accommodations that can and/or should be made to make these services and products more accessible to LEP persons.

Four Factors to Formulate an LEP Plan
In determining how to provide effective and meaningful access for LEP customers, the U. S. Department of Transportation (DOT) has established the following four guidelines to consider in determining “reasonable steps” to be taken by MACORTS and ATS:

1. The number or proportion of LEP persons served or encountered in the eligible service population,
2. The frequency with which LEP persons encounter the services, programs, or activities provided,
3. The nature and importance of the services, programs, or activities; and
4. The resources available to the program and the costs of providing interpretation/translation services.
Madison Athens-Clarke Oconee Regional Transportation Study

The Madison Athens-Clarke Oconee Regional Transportation Study (MACORTS) was formed in 1969 and is the Metropolitan Planning Organization for transportation planning in Athens-Clarke County and portions of Madison, Oconee, Oglethorpe, and Jackson Counties. MACORTS is responsible for implementing the 3-C (comprehensive, cooperative, and continuing) transportation planning process.

Figure 1: Madison Athens-Clarke Oconee Regional Transportation Study Planning Boundary

The Athens-Clarke County Planning Department, in conjunction with the Georgia Department of Transportation, is responsible for carrying out the transportation planning process as mandated under federal legislation. MACORTS products include, but are not limited to, the Long Range Transportation Plan, the Transportation Improvement Program, the Unified Planning Work Program, and the Participation Plan.

The Long Range Transportation Plan outlines the transportation planning vision for the next 20 years. The Transportation Improvement Program (TIP) is an annually updated program of projects to receive federal funding during the next 4 fiscal years for implementation. The Unified Planning Work Plan (UPWP) is the annual operating and capital budget for MACORTS. The Participation Plan outlines how and when public involvement activities will be conducted. These documents are the main work efforts of MACORTS.
**Athens Transit System**

Athens Transit System is a department of the Athens-Clarke County Unified Government that provides public transportation for Athens-Clarke County with 23 buses on 19 bus routes throughout the county. Athens Transit System offers “The Bus” service, which is fixed route buses that operate Monday – Saturday from approximately 6:00 am to 11:00 pm, depending on the route, day, and time of year. In FY 2012, the Athens Transit provided over 1.8 million rides on the fixed route service. All fixed route vehicles are ADA-accessible.

Athens Transit offers a Demand Response transportation option for people with a mobility impairment called “The Lift”. This service is provided for those patrons who cannot ride the fixed route bus service. In FY 2012, the Athens Transit System provided 9,234 rides on demand response service. Additionally, Athens Transit has a “Bus-N-Bike” program which makes daily commuting much easier, safer, and more convenient for cyclists to ride the bus. All fixed route vehicles are equipped with a bicycle rack mounted to the front of the bus.

*Figure 2: Athens Transit System Map*
Limited English Proficiency Analysis

This plan uses the four factors outlined by the US Department of Transportation to determine the level and extent of language assistance necessary to reasonably ensure meaningful access to public transit and MACORTS services within the MPO area. Data used in this analysis was obtained from the U.S. Census Bureau, either from the decennial Census or the American Community Survey’s 5-year estimate. Due to the constraints of the available data, the member counties were analyzed in their entirety, without regard to how much of the county is included within the MPO boundary. Therefore, it should be noted that the number of LEP persons within the MACORTS area is significantly smaller than this data suggests. Recommendations are based on the results of the analysis including the available data.

Factor 1: The number of LEP persons served in the eligible service population

The MPO has developed a demographic profile of the population in the MACORTS region and ATS service area. As illustrated in Table 1, the MPO region has a total population of 272,075 individuals. This total represents the entirety of Athens-Clarke, Madison, Oconee, Oglethorpe, and Jackson Counties, not just the area included in the MPO. The race and ethnic breakout is as follows:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>QT-P4</td>
<td>Caucasian</td>
<td>72,238</td>
<td>24,634</td>
<td>29,004</td>
<td>11,662</td>
<td>52,496</td>
<td>190,034</td>
</tr>
<tr>
<td>QT-P4</td>
<td>African American</td>
<td>30,988</td>
<td>2,355</td>
<td>1,635</td>
<td>2,566</td>
<td>4,103</td>
<td>41,647</td>
</tr>
<tr>
<td>QT-P4</td>
<td>American Indian</td>
<td>247</td>
<td>74</td>
<td>49</td>
<td>35</td>
<td>124</td>
<td>529</td>
</tr>
<tr>
<td>QT-P4</td>
<td>Asian</td>
<td>4,899</td>
<td>178</td>
<td>1,022</td>
<td>65</td>
<td>1,033</td>
<td>7,167</td>
</tr>
<tr>
<td>QT-P4</td>
<td>Hawaiian / Islander</td>
<td>84</td>
<td>1</td>
<td>5</td>
<td>2</td>
<td>13</td>
<td>105</td>
</tr>
<tr>
<td>QT-P4</td>
<td>Other Race</td>
<td>5,763</td>
<td>527</td>
<td>641</td>
<td>285</td>
<td>1,649</td>
<td>8,865</td>
</tr>
<tr>
<td>QT-P4</td>
<td>Two or More Races</td>
<td>2,525</td>
<td>351</td>
<td>452</td>
<td>284</td>
<td>1,067</td>
<td>4,679</td>
</tr>
<tr>
<td>QT-P10</td>
<td>Hispanic</td>
<td>12,192</td>
<td>1,139</td>
<td>1,436</td>
<td>546</td>
<td>3,736</td>
<td>19,049</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>128,906</td>
<td>29,259</td>
<td>34,244</td>
<td>15,445</td>
<td>64,221</td>
<td>272,075</td>
</tr>
</tbody>
</table>

Source: US Census Bureau 2010, SFI -- Forms QT-P4 (Race, Combination of Two Races, and Not Hispanic or Latino) and QT-P10 (Hispanic or Latino by Type)
Though the regional total speakers for the MACORTS region is 272,075 and for Athens-Clarke County is 128,906, the MPO staff has based the LEP analysis upon the Census data reported for persons ages 18-65. This age group represents the ‘customers’ of ATS and MACORTS. Services and products provided by ATS and MACORTS have a greater impact on the lives of this age group. MACORTS products, particularly, are not suited nor intended for consumption by minors. Children, too, would generally have guidance from adults on navigating the Athens Transit System. Table 2 shows the number of total speakers in the 18 - 65+ age group broken out by race and by county. The total number of speakers in this age group for the region is 208,824. For Athens-Clarke County alone, the number of total speakers in this age group is 104,224. These are the totals that were used as a basis for the analysis of the number of LEP individuals in the region and ATS service area.

Table 2 - Total 'Speakers' by Race Age 18 - 65+

<table>
<thead>
<tr>
<th>Census Source</th>
<th>Race</th>
<th>Athens-Clarke County</th>
<th>Madison County</th>
<th>Oconee County</th>
<th>Oglethorpe County</th>
<th>Jackson County</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>P10</td>
<td>Caucasian</td>
<td>63,968</td>
<td>18,860</td>
<td>20,968</td>
<td>9,008</td>
<td>39,142</td>
<td>151,946</td>
</tr>
<tr>
<td>P10</td>
<td>African American</td>
<td>22,492</td>
<td>1,749</td>
<td>1,211</td>
<td>1,977</td>
<td>3,019</td>
<td>30,448</td>
</tr>
<tr>
<td>P10</td>
<td>American Indian</td>
<td>181</td>
<td>56</td>
<td>28</td>
<td>25</td>
<td>89</td>
<td>379</td>
</tr>
<tr>
<td>P10</td>
<td>Asian</td>
<td>4,290</td>
<td>138</td>
<td>706</td>
<td>49</td>
<td>689</td>
<td>5,872</td>
</tr>
<tr>
<td>P10</td>
<td>Hawaiian / Islander</td>
<td>59</td>
<td>1</td>
<td>2</td>
<td>2</td>
<td>10</td>
<td>74</td>
</tr>
<tr>
<td>P10</td>
<td>Other Race</td>
<td>3,669</td>
<td>291</td>
<td>384</td>
<td>163</td>
<td>994</td>
<td>5,501</td>
</tr>
<tr>
<td>P10</td>
<td>Two or More Races</td>
<td>1,632</td>
<td>151</td>
<td>206</td>
<td>120</td>
<td>497</td>
<td>2,606</td>
</tr>
<tr>
<td>P11</td>
<td>Hispanic</td>
<td>7,933</td>
<td>642</td>
<td>854</td>
<td>318</td>
<td>2,251</td>
<td>11,998</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>104,224</td>
<td>21,888</td>
<td>24,359</td>
<td>11,662</td>
<td>46,691</td>
<td>208,824</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, Census 2010, SF1 – Form P10 (Race for the Population 18 years and over) and P11 (Hispanic or Latino, and Not Hispanic or Latino by Race for the Population 18 years and over)

Table 3 shows the 10 most prevalent languages spoken in the MACORTS region as reported by the U.S. Census Bureau. This data includes all age brackets from 5 years old and up. A more detailed breakdown of the data was not available from the U.S. Census Bureau.
Table 3 – Top Ten Languages Spoken in MACORTS Region

<table>
<thead>
<tr>
<th>5 yrs and over Population</th>
<th>231,464</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>209,226</td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>14,127</td>
</tr>
<tr>
<td>Chinese</td>
<td>1,117</td>
</tr>
<tr>
<td>Korean</td>
<td>1,042</td>
</tr>
<tr>
<td>French (incl. Patois, Cajun)</td>
<td>790</td>
</tr>
<tr>
<td>Hmong</td>
<td>572</td>
</tr>
<tr>
<td>Arabic</td>
<td>467</td>
</tr>
<tr>
<td>Other Indo-European Langs</td>
<td>419</td>
</tr>
<tr>
<td>German</td>
<td>376</td>
</tr>
<tr>
<td>Other Indic Langs</td>
<td>364</td>
</tr>
<tr>
<td>Total</td>
<td>228,300</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, American Community Survey 5-yr Estimate: 2006 –2010; B16001 – Language Spoken at Home By Ability to Speak English for Population 5 years and older (county level)

Table 4 shows the 10 most prevalent languages spoken in Athens-Clarke County as reported by the U.S. Census Bureau. This data includes all age brackets from 5 years old and up. A more detailed breakdown of the data was not available from the U.S. Census Bureau.

Table 4 – Top Ten Languages Spoken in Athens-Clarke County

<table>
<thead>
<tr>
<th>5 years and over population</th>
<th>107,985</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>93,550</td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>8,963</td>
</tr>
<tr>
<td>Chinese</td>
<td>1,067</td>
</tr>
<tr>
<td>Korean</td>
<td>638</td>
</tr>
<tr>
<td>French (incl. Patois, Cajun)</td>
<td>462</td>
</tr>
<tr>
<td>Arabic</td>
<td>389</td>
</tr>
<tr>
<td>Other Indo-European Langs</td>
<td>366</td>
</tr>
<tr>
<td>German</td>
<td>296</td>
</tr>
<tr>
<td>Other Indic Langs</td>
<td>275</td>
</tr>
<tr>
<td>African Langs</td>
<td>228</td>
</tr>
<tr>
<td>Total</td>
<td>106,234</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, American Community Survey 5-yr Estimate: 2006 –2010; B16001 – Language Spoken at Home By Ability to Speak English for Population 5 years and older (county level)
The Census Bureau has four classifications for how well people speak English. The classifications are ‘very well’, ‘well’, ‘not well’, and ‘not at all’. For the purposes of the LEP Plan, people who were categorized as speaking English ‘not well’ or ‘not at all’ by the U.S. Census Bureau have been considered to be Limited English Proficient persons. As Table 5 shows, Athens-Clarke County has the highest percentage of LEP individuals with 3.5%, while the entire region has approximately 2.5% of the population categorized as having limited English proficiency.

**Table 5 – Total Limited English Proficient Speakers**

<table>
<thead>
<tr>
<th></th>
<th>Total Speakers</th>
<th>Total LEP Individuals</th>
<th>Total % LEP Individuals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Athens-Clarke Co.</td>
<td>104,224</td>
<td>3,649</td>
<td>3.5%</td>
</tr>
<tr>
<td>Madison Co.</td>
<td>21,888</td>
<td>318</td>
<td>1.5%</td>
</tr>
<tr>
<td>Oconee Co.</td>
<td>24,359</td>
<td>392</td>
<td>1.6%</td>
</tr>
<tr>
<td>Oglethorpe Co.</td>
<td>11,662</td>
<td>52</td>
<td>0.4%</td>
</tr>
<tr>
<td>Jackson Co.</td>
<td>46,691</td>
<td>802</td>
<td>1.7%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>208,824</strong></td>
<td><strong>5,213</strong></td>
<td><strong>2.5%</strong></td>
</tr>
</tbody>
</table>

*Source: U.S. Census Bureau, American Community Survey 3-yr Estimate: 2006–2010; B16004 – Age by Language Spoken at Home by Ability*

Figures 3 and 4 on the following pages illustrate graphically the density of LEP persons by census tract. Figure 3 shows the density based on the regional totals. Figure 4 shows the concentration of LEP persons in Athens-Clarke County compared to the ATS service area.
Figure 3: Concentrations of LEP persons (16+ years of age) by Census Tract within the MACORTS planning area counties compared to regional totals.
Figure 4: Shows the concentrations by Census Tracts of LEP persons (18+ yrs of age) within Athens-Clarke County with AT3 service.
Factor 2: The frequency with which LEP persons encounter the services provided.

To date, the MPO has had very little contact with LEP persons in the course of MPO business. ATS has more contact with LEP’s persons due to the nature of services provided and number of persons with whom the staff interacts with on a weekly basis, but the percentage is still quite small. ATS and MPO planning staff were surveyed in regards to their interactions with LEP individuals in an average week. The MPO staff has had no requests for assistance from LEP persons in the last 13 years. Anecdotal, MPO staff noted only interacting once with LEP individuals during the course of their public interactions or day-to-day business. The remainder of the Athens-Clarke County Planning Department staff, who are housed with the MPO staff, indicated that they encounter only 1 or 2 LEP persons per week. Other than a very rare exception, these people bring another person with them who speaks English to assist them, according to the survey. Table 6 shows the Athens-Clarke County Planning Department number of customers and the number of LEP persons on an annual basis. LEP individuals make up approximately 0.1% of the customers annually.

<table>
<thead>
<tr>
<th>LEP Persons Per Week</th>
<th>Extrapolated LEP Persons Per Year</th>
<th>Total Customers Per Week</th>
<th>Extrapolated Customers Per Year</th>
<th>Weekly Percentage LEP Customers</th>
<th>Annual Percentage LEP Customers</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>35</td>
<td>719</td>
<td>35,950</td>
<td>0.14%</td>
<td>0.10%</td>
</tr>
</tbody>
</table>

Additional Notes: This data came from a survey of employees of the Athens-Clarke Planning Department. They were asked how many LEP persons were encountered in an average week. This office handles zoning, land use, and plans review. The MPO, MACORTS, is administered out of this department. The number of customers per year was derived from a survey of total customers during the week of Dec. 5 - 7, 2012.

The staff of the Athens Transit System was surveyed as well. They were asked how many LEP persons they encounter in the average week. Responses ranged from zero to 30 persons per week. The informal accounting of LEP persons was extrapolated to annual totals and compared to the number of people that ride ATS by route and by the total annual ridership. Table 7 illustrated that the highest percentage by route was on Route 27 – Barnett Shoals / Cedar Shoals with 0.9% of ridership being classified as LEP. When compared to the total annual ridership, the percentage of LEP persons is approximately 0.2%.
Table 7 – Limited English Proficiency Riders of Athens Transit System

<table>
<thead>
<tr>
<th>Bus Rts</th>
<th>Average Annual Number of LEP Riders</th>
<th>Average Annual Ridership</th>
<th>LEP Annual Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0</td>
<td>77,214</td>
<td>0.0%</td>
</tr>
<tr>
<td>2</td>
<td>130</td>
<td>36,168</td>
<td>0.4%</td>
</tr>
<tr>
<td>3</td>
<td>0</td>
<td>24,925</td>
<td>0.0%</td>
</tr>
<tr>
<td>5</td>
<td>225</td>
<td>125,682</td>
<td>0.2%</td>
</tr>
<tr>
<td>6</td>
<td>52</td>
<td>78,701</td>
<td>0.1%</td>
</tr>
<tr>
<td>7</td>
<td>364</td>
<td>73,620</td>
<td>0.5%</td>
</tr>
<tr>
<td>8</td>
<td>322</td>
<td>61,590</td>
<td>0.5%</td>
</tr>
<tr>
<td>9</td>
<td>364</td>
<td>100,191</td>
<td>0.4%</td>
</tr>
<tr>
<td>12</td>
<td>182</td>
<td>348,610</td>
<td>0.1%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Bus Rts</th>
<th>Average Annual Number of LEP Riders</th>
<th>Average Annual Ridership</th>
<th>LEP Annual Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>234</td>
<td>235,638</td>
<td>0.1%</td>
</tr>
<tr>
<td>20</td>
<td>322</td>
<td>143,461</td>
<td>0.2%</td>
</tr>
<tr>
<td>21</td>
<td>0</td>
<td>27,587</td>
<td>0.0%</td>
</tr>
<tr>
<td>22</td>
<td>208</td>
<td>43,186</td>
<td>0.5%</td>
</tr>
<tr>
<td>24</td>
<td>104</td>
<td>56,097</td>
<td>0.2%</td>
</tr>
<tr>
<td>25</td>
<td>125</td>
<td>146,108</td>
<td>0.1%</td>
</tr>
<tr>
<td>26</td>
<td>208</td>
<td>98,607</td>
<td>0.2%</td>
</tr>
<tr>
<td>27</td>
<td>858</td>
<td>90,482</td>
<td>0.9%</td>
</tr>
<tr>
<td>28</td>
<td>0</td>
<td>13,805</td>
<td>0.0%</td>
</tr>
<tr>
<td>Total</td>
<td>3,699</td>
<td>1,782,082</td>
<td>0.2%</td>
</tr>
</tbody>
</table>

Factor 3: The nature and importance of the services and programs.

MACORTS is responsible for regional transportation planning. Denial or delay of access to services or information provided by the MPO would not have life threatening or even serious implications on an LEP individual. This is especially true if compared to services such as healthcare, emergency transportation, water, sewer, fire protection, police protection, and other essential services.

Athens Transit System provides public transportation to the Athens-Clarke County area giving people access to work, healthcare, and other programs and/or services. Without access to public transportation, many of these individuals would not be able to take advantage of other services that could potentially be life changing or life sustaining. Therefore, lack of public transportation services could have an adverse effect on LEP individuals.

Factor 4: The Resources Available to the MACORTS, ATS, and Overall Cost

MACORTS serves a very small percentage of LEP persons, less than 2.5 % or approximately 5,213 in the region and has limited funds available for LEP services. Providing translation assistance to LEP persons would be funded entirely from existing MACORTS operating funds and would compete with other operational requirements for funding. MACORTS’s annual
federal allocation is approximately $173,000 for a total base grant amount of approximately $216,000. The total budget varies from year to year depending upon regulations regarding carryover funding.

Given the small number of LEP people within the region and the MACORTS budget, it would be burdensome to produce written translations for the core MACORTS documents. The expense and time required to provide these translated documents could jeopardize the mandated objectives of the transportation planning program. It is appropriate, however, for MACORTS to provide translated summaries of core products as requested by LEP persons. A translation option is provided on each page of the MACORTS website (www.macorts.org) so that pages from the website can be translated into any of several languages (Chinese, Dutch, French, German, Greek, Italian, Japanese, Korean, Portuguese, Russian, or Spanish).

The Athens Transit System has been very proactive in their treatment of LEP persons. ATS has funding available through federal grants and the local government to continue to enhance their services for the LEP population.

Providing Notice to LEP Persons
MACORTS will provide statements offering language assistance in public information, public notices, and on the MACORTS website to those persons requiring language assistance or special accommodations. MACORTS and ATS provide the technology to translate their websites into several languages. ATS has translated public materials, such as route guides and schedules, available in Spanish.

Implementation of LEP Initiatives
With advance notice of three to seven calendar days, MACORTS will provide interpreter services at the Technical Coordinating Committee meetings, Policy Committee meetings, or other public meetings. Interpreters will provide services for both the foreign language and hearing impaired. Public notices will provide the contact information for this service. “I Speak” cards or a list of identifiers in the various languages will be provided for use at all public meetings to help identify the needs of LEP persons attending. Public meetings notices are published in Spanish in a local Spanish-language publication for all MACORTS public meetings.

The Athens Transit System is providing many services to LEP persons currently. ATS schedules are available in Spanish and Braille. A picture book was developed that shows how to ride “The Bus” for non-English speakers. The ATS website includes a mechanism to translate the content into one of several languages. There are currently four ATS staff members that speak Spanish fluently and are available to assist in interpretation as needed. ATS actively markets to the Spanish-speaking population.
MACORTS and ATS Staff Training
MACORTS staff members are provided training on the requirements for providing meaningful access to services for LEP persons. Additional training opportunities will be taken advantage of as they become available.

ATS staff members receive training regarding the Limited English Proficiency regulations and available resources as part of the Sensitivity Training at New Employee Orientation. Periodic refresher courses are provided as part of ATS monthly staff meetings. ATS staff has access to take classes in Command Spanish through the Unified Government of Athens-Clarke County periodically. Twenty copies of Rosetta Stone’s Spanish class have been purchased by ATS for use by employees who desire to learn Spanish voluntarily. It is available for use at the Operations and Maintenance Facility.

LEP Plan Access
MACORTS and ATS will post the LEP Plan on their websites at www.macorts.org and www.athenstransit.com, respectively. Anyone with internet access will be able to access the plan. For those without personal Internet service, several area libraries offer free Internet access. Digital versions or hard copies of the LEP Plan will be provided to MACORTS members, the Georgia Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any person or agency requesting a copy, free of charge.

Any questions or comments regarding this plan should be directed to the MACORTS staff:

Athens-Clarke Planning Department
120 W. Dougherty Street
Athens, GA 30601
Phone (706)-613-3515
Email: macorts@athensclarkecounty.com
Appendix H

Operating Area Language Data:
MACORTS / Athens Transit Service Area
<table>
<thead>
<tr>
<th>Language</th>
<th>MACORTS Total</th>
<th>Percent of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>147226</td>
<td></td>
</tr>
<tr>
<td>Speak only English</td>
<td>129273</td>
<td>87.8%</td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>11622</td>
<td>7.9%</td>
</tr>
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<td>Speak English “very well”</td>
<td>5205</td>
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<tr>
<td>Speak English less than “very well”</td>
<td>6417</td>
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<tr>
<td>French (incl. Patois, Cajun)</td>
<td>504</td>
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</tr>
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<td>407</td>
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<td>French Creole</td>
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</tr>
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<tr>
<td>Portuguese or Portuguese Creole</td>
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<tr>
<td>Other West Germanic languages</td>
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</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>10</td>
<td>0.0%</td>
</tr>
<tr>
<td>Language</td>
<td>MACORTS Total</td>
<td>Percent of Population</td>
</tr>
<tr>
<td>--------------------------</td>
<td>---------------</td>
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<td>Scandinavian languages</td>
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<td>Other Slavic Languages</td>
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<td>MACORTS Total</td>
<td>Percent of Population</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>---------------</td>
<td>-----------------------</td>
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<td>Hmong</td>
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</tr>
<tr>
<td>Language</td>
<td>MACORTS Total</td>
<td>Percent of Population</td>
</tr>
<tr>
<td>------------------------------</td>
<td>---------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>Speak English “very well”</td>
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<td>0.0%</td>
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<tr>
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</tr>
<tr>
<td>Speak English less than “very well”</td>
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<td>0.0%</td>
</tr>
<tr>
<td>Other Pacific Island languages</td>
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<tr>
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<td>0.0%</td>
</tr>
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<td>0.0%</td>
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<td>Other Native American languages</td>
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</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Language</td>
<td>MACORTS Total</td>
<td>Percent of Population</td>
</tr>
<tr>
<td>-----------------------</td>
<td>---------------</td>
<td>-----------------------</td>
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<td>Hungarian</td>
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<td>0.0%</td>
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</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>African languages</td>
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<td>0.1%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>37</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other and unspecified languages</td>
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<td>0.0%</td>
</tr>
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<td>Speak English “very well”</td>
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<td>0.0%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>0</td>
<td>0.0%</td>
</tr>
</tbody>
</table>
Appendix I
Demographic Maps
Title VI Plan

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Title VI Plan

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Appendix J
Title VI Equity Analysis
Title VI Plan

Athens Transit has not recently built any new facilities therefore a Title VI Equity Analysis not preformed has not been performed. However, staff has included the excerpt from MACORTS 2040 Long Range Transportation Plan approved October 8, 2014 containing the Title VI Analysis for the MACORTS region of which Athens Transit is located.
SECTION IX
TITLE VI AND ENVIRONMENTAL JUSTICE

Title VI of the Civil Rights Act of 1964, states no person on the ground of race, color, or national origin shall be subject to discrimination under any program or activity receiving Federal financial assistance. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, signed by President Clinton in 1994 reaffirmed the tenants of the 1964 law. It provides that “each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionally high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low income populations.”

Toward meeting the spirit and letter of the law, MACORTS has conducted and open, inclusive Long Range Plan update. Detailed MACORTS’ Public Involvement Procedures for this LRTP update are listed in Appendix A of this document. In addition, MACORTS will work with State and Federal partners to carry forth guidance as outlined in Georgia Department of Transportation’s “Urban Area Environmental Justice Evaluation”. The MACORTS Participation Plan and Limited English Proficiency Plan were both updated in 2014 and contain detailed data and process concerning MACORTS compliance with Title VI and Environmental Justice.

On the following pages, a Title VI / Environmental Justice (EJ) analysis of the MACORTS area is presented focusing on the racial makeup of the population, elderly population, population earning below the poverty rate, disabled population, and those with no access to a personal vehicle (zero car). Races were broken down into the following categories, as defined by the U.S. Census Bureau: Black or African American, American Indian & Alaska Native, Asian, Hispanic or Latino, and Native Pacific Islander and ‘Other’. The maps for Figures 13 – 20 were generated using data from the U.S. Census Bureau’s 2010 Census or American Community Survey 5 year average (2008 – 2012). Data was mapped at the block group or census tract depending on the availability of data. The maps show the concentration of the subject population compared to the total subject population in the MACORTS region. For perspective, Table 34 shows the breakdown of the subject populations in the MACORTS region in real numbers and percentage by county instead of percentage of the region.
### Table 34
EI / Title VI Populations Within MACORTS

<table>
<thead>
<tr>
<th>Population</th>
<th>Athens-Clarke</th>
<th>Percentage of County Population</th>
<th>Oconee</th>
<th>Percentage of County Population</th>
<th>Madison</th>
<th>Percentage of County Population</th>
<th>MACORTS Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>116,638</td>
<td>100.0%</td>
<td>24,744</td>
<td>100.0%</td>
<td>11,784</td>
<td>100.0%</td>
<td>153,166</td>
</tr>
<tr>
<td>Total Working Population 16 yrs +</td>
<td>48,728</td>
<td>100.0%</td>
<td>11,728</td>
<td>100.0%</td>
<td>4,974</td>
<td>100.0%</td>
<td>65,430</td>
</tr>
<tr>
<td>African American</td>
<td>30,695</td>
<td>26.3%</td>
<td>1,317</td>
<td>5.3%</td>
<td>1,396</td>
<td>11.8%</td>
<td>33,408</td>
</tr>
<tr>
<td>Asian</td>
<td>4,811</td>
<td>4.1%</td>
<td>977</td>
<td>3.9%</td>
<td>63</td>
<td>0.5%</td>
<td>5,851</td>
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<tr>
<td>Hispanic / Latino</td>
<td>12,192</td>
<td>10.5%</td>
<td>45</td>
<td>0.2%</td>
<td>37</td>
<td>0.3%</td>
<td>12,274</td>
</tr>
<tr>
<td>Native American, Other</td>
<td>459</td>
<td>0.4%</td>
<td>1,263</td>
<td>5.1%</td>
<td>807</td>
<td>6.8%</td>
<td>2,529</td>
</tr>
<tr>
<td>Disabled</td>
<td>12,436</td>
<td>10.7%</td>
<td>2,509</td>
<td>10.1%</td>
<td>1,575</td>
<td>13.4%</td>
<td>16,520</td>
</tr>
<tr>
<td>Elderly</td>
<td>9,952</td>
<td>8.5%</td>
<td>2,733</td>
<td>11.0%</td>
<td>1,448</td>
<td>12.3%</td>
<td>14,133</td>
</tr>
<tr>
<td>Below Poverty Level</td>
<td>37,238</td>
<td>31.9%</td>
<td>2,033</td>
<td>8.2%</td>
<td>2,209</td>
<td>18.7%</td>
<td>41,480</td>
</tr>
<tr>
<td>Zero Car*</td>
<td>1,456</td>
<td>3.0%</td>
<td>54</td>
<td>0.5%</td>
<td>211</td>
<td>4.2%</td>
<td>1,721</td>
</tr>
</tbody>
</table>

*Note: Zero Car population percentage based on the total working population that is over 16 years of age.

Figures 13 – 20 give a graphical representation of the varying concentrations of the populations in the table above. Using these maps with the projects included in the 2040 Long Range Transportation Plan overlaid upon them, the possible Title VI / Environmental Justice impact of the program of projects can be identified.
Title VI Plan

Madison Athens-Clarke Oconee Regional Transportation Study (MACORTS)

Figure 13: Hispanic Population per Block Group

Percentage of Hispanic Population Compared to Total Hispanic Population by Region

- 0.00 - 2.00
- 2.01 - 4.00
- 4.01 - 6.00
- 6.01 - 14.00

Source: Data: U.S. Census Bureau, 2010 Census

Figure 14: Native American, Pacific Islander or Census Listed "Other" Population per Block Group

Percentage of "Other" Population Compared to Total "Other" Population by Region

- 0.00 - 2.00
- 2.01 - 4.00
- 4.01 - 6.00
- 6.01 - 14.00

Source: Data: U.S. Census Bureau, 2010 Census

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Table 35 and 36 provide a summary of the EJ / Title VI populations that could be impacted by the projects in the 2040 LRTP. During the development of those projects that could affect the subject populations, special care should be taken to protect those populations from impacts or measures should be put in place to minimize impacts. Public involvement activities for those projects should include targeted efforts to reach members of the affected population(s). It should be noted that the proximity of the Lexington Road Bike Lanes (Bike-1) to a high concentration of ‘Zero Car’ population lends support to the need for that project to be included in the Plan.

### Table 35

<table>
<thead>
<tr>
<th>MAP NUMBER</th>
<th>LRTP PROJECT NAME</th>
<th>PROJECT NAME</th>
<th>High Concentration of African American Population</th>
<th>High Concentration of Asian Population</th>
<th>High Concentration of Hispanic Population</th>
<th>High Concentration of American Indian, Alaska Native, Hawaiian Population</th>
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<td>R-23</td>
<td>Daniels Bridge Road Extension (Oconee)</td>
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<td>US-280 Widening - Phase 1 (Madison)</td>
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<td>US-280 Widening - Phase 2 (Madison)</td>
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<td>Spradlin Mill Road Widening (Madison)</td>
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<td>High Concentration of Elderly Pop</td>
<td>High Concentration of Populations Earning Below Poverty Level</td>
<td>High Concentration of Zero-Car Households</td>
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<td>US 441 / SR 24 Widening (Oconee)</td>
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<td>Old Danielsville Rd / Pedestrian Rd at US 29 Intersection Improvements (Madison)</td>
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<td>US 10 Loop at Lexington Highway Widening and Intersection Improvements (Clarke)</td>
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Table 36
Environmental Justice / Title VI Analysis Summary – Non-Race

- Athens Transit
- Transit Department of the Unified Government of Athens-Clarke County
Maps showing public transportation provided in context of demographics of the MACORTS region:
Title VI Plan

Athens Transit System
Disabled Population per Census Tract

- Athens-Clarke County Boundary
- Bus Routes
- Demand Response Service Area

1:125,000
Produced by the Athens-Clarke County, Georgia,
Regional Transportation Study (MACORTS), 2014

Percentage of Disabled Population Compared to Total Population in Athens-Clarke County
- 0.00 - 0.07
- 0.08 - 0.15
- 0.16 - 0.22
- 0.23 - 0.30

Source Data: U.S. Census Bureau,
American Community Survey 7-year average, 2008-2012, B08204

Maps are available from the Athens-Clarke County Planning Department:
525 W. Broad St.
Athens, GA 30601
info@athensclarkecounty.com

Athens Transit System
Elderly (65+) Population per Block Group

- Athens-Clarke County Boundary
- Bus Routes

1:125,000
Produced by the Athens-Clarke County, Georgia,
Regional Transportation Study (MACORTS), 2014

Percentage of Elderly Population Compared to Total Population in Athens-Clarke County
- 0.00 - 0.07
- 0.08 - 0.15
- 0.16 - 0.22
- 0.23 - 0.30

Source Data: U.S. Census Bureau,
American Community Survey 7-year average, 2008-2012, B08204

Maps are available from the Athens-Clarke County Planning Department:
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info@athensclarkecounty.com

Athens Transit
Transit Department of the Unified Government of Athens-Clarke County
Title VI Plan

Athens Transit

Transit Department of the Unified Government of Athens-Clarke County
12.0 Appendices

APPENDIX A FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B CURRENT SYSTEM DESCRIPTION
APPENDIX C TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E TITLE VI COMPLAINT FORM
APPENDIX F PUBLIC PARTICIPATION PLAN
APPENDIX G LANGUAGE ASSISTANCE PLAN
APPENDIX H OPERATING AREA LANGUAGE DATA: ATHENS TRANSIT SERVICE AREA
APPENDIX I DEMOGRAPHIC MAPS
APPENDIX J TITLE VI EQUITY ANALYSIS
APPENDIX K TEXT FORMATTING PALETT